

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Erik B. Jensen.

Misc. No. 23-3005

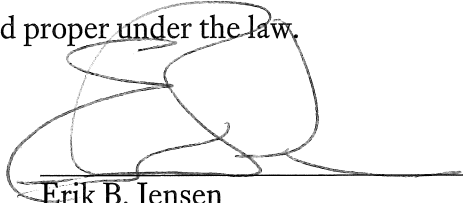
**Omnibus Motion of Erik B. Jensen  
to Withdraw as Counsel for Various Debtors**

I, Erik B. Jensen, respectfully state as follows:

1. I am currently the counsel of record for debtors in the fifty-four bankruptcy cases in this district listed in Exhibit A (“my clients”).
2. For personal and professional reasons, I have decided to stop practicing law in the United States Bankruptcy Court for the Eastern District of Pennsylvania.
3. Michael A. Cibik of Cibik Law, P.C. has agreed to take over all of my cases. Mr. Cibik is one of the most experienced and respected bankruptcy attorneys in this district and he is well equipped to represent my clients.
4. However, Mr. Cibik will not enter an appearance in these cases until or unless my clients consent to the transfer.
5. I have tried to obtain the consent of all my clients for this transfer, but I do not have the administrative support to do so.
6. An attorney may not withdraw as counsel for a debtor unless another attorney enters an appearance on their behalf simultaneously, or unless the Court orders the withdrawal. L.B.R. 2091-1.
7. It is in the best interests of my clients for the Court to enter an order: (a) allowing me to withdraw as counsel, (b) substituting Mr. Cibik as counsel for my clients pursuant to 11 U.S.C. §105 and L.B.R. 2091-1, and (c) ordering that the representation of my clients by Mr. Cibik will be governed by the same terms as my clients agreed to when retaining me as their attorney.
8. This motion is being filed with Mr. Cibik’s consent.

**NOW, THEREFORE,** I ask this Court to grant relief in the form of order attached and to grant such other relief as may be necessary and proper under the law.

Date: 12/20/23

A handwritten signature in black ink, appearing to read "Erik B. Jensen", written over a horizontal line.

Erik B. Jensen  
Jensen Bagnato, PC  
1500 Walnut St.  
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Philadelphia, PA 19102  
215-546-4700  
erik@jensenbagnatolaw.com

**EXHIBIT A**

17-14815-mdc	Kelly Dutton
18-15688-amc	Maria F Goodwin
18-16282-mdc	Khalilah Robinson
18-16393-pmm	Tama L. Stoeber and Daniel H. Stoeber
18-16614-amc	Abdal Ali
18-16751-pmm	Rickey G Farley
18-16888-amc	Harolyn Rodgers and Elizabeth Rodgers
18-17374-mdc	Joseph Wright and Marivic Wright
18-18404-mdc	Juan M Mendez
19-10047-amc	Jason Michael Guille and Julie Guille
19-10196-mdc	Etangalia Sherrie Canty
19-10304-mdc	Ousmane Timera
19-10583-mdc	Pedro Melendez
19-12111-pmm	Sergio Perez, Jr.
19-12198-amc	Jennifer Santiago
19-12304-mdc	Lorie Dominick
19-12562-amc	Robert Bernatovich
19-12847-amc	Pamela Fields
19-12996-mdc	Arlis B. Hamilton
19-13351-amc	Eric C. Colgan and Phyllis J Troxell-Colgan
19-13545-amc	Tyrone C Moore
19-14039-mdc	Vincent Williams-Bey and Michele Williams-Bey
19-14260-mdc	Clara L. Chandler
19-14392-mdc	Mohamed S Kabba
19-14448-amc	Melvin D. Green
19-14675-pmm	Mohamed Zedan
19-15133-amc	Thomas G. McKnight and Marie McKnight

19-15319-amc	Sammy Mendez
19-15591-mdc	Eileen Printz and Scott T. Printz
19-16009-mdc	Elizabeth F. Phillips
19-16391-mdc	Kia M. Callands
19-16416-mdc	Jeremy T. Tanner
19-17841-mdc	Sonia Agosto
19-17855-amc	Aoatoa F. Polamalu
20-10829-amc	Darcell D. White
20-11807-amc	Tracy L Brown
20-12233-amc	Keisha M. Brown
20-12303-amc	Theodore A. Green
20-13155-mdc	Linda Carthy and Clayton C Carthy
20-14815-amc	David Ramsey
21-10885-amc	James Wooden and Vernice Wooden
21-10886-mdc	Bruce M. Mines
21-11144-amc	Wilfredo Rodriguez
21-11797-amc	Kim Simmons
21-12131-mdc	Matthew O James
21-12152-pmm	Anthony Pellegrino and Ramona Pellegrino
21-12280-amc	Robert Howard Jackson
21-12558-amc	Valerie Oneil
21-12930-pmm	Ronald Raymond Wabals and Carol Ann Wabals
22-10461-mdc	Brian Campbell
22-10860-amc	George May, Jr.
22-12722-amc	Victor B. Gonzalez-Urgiles
23-10037-mdc	Rae Kimberly Hall
23-10616-mdc	Cristina M Cardona